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AMEREN UTILITIES)

In the matter of the)

Energy Efficiency and Demand Response Plan)

Filed pursuant to Section 12- 103(f) of the)

Public Utilities Act)

Docket No. 07-0539

**BRIEF ON EXCEPTIONS
OF THE NATURAL RESOURCES DEFENSE COUNCIL**

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I. INTRODUCTION AND SUMMARY OF POSITION

The Natural Resources Defense Council (NRDC) supports the Proposed Order's qualified approval of the Commonwealth Edison Company's (Ameren) Energy Efficiency and Demand Response Plan. Plan approval by February 15, 2008 will allow Ameren soon to deliver cost-effective demand-side resources to ratepayers in Illinois that will save ratepayers money and reduce carbon emissions and air pollutants compared to conventional supply-side resources. Furthermore, NRDC strongly commends Administrative Law Judges (ALJ) Sainsot and Kimbrel for preparing a detailed, thoughtful Proposed Order (PO) on many complicated issues of first impression in Illinois under an extremely compressed time frame. The PO is particularly impressive because it addresses not only the narrow issue of whether the Plan meets statutory requirements and should be approved, but also summarizes and responds to the many additional complex issues that parties raised in the course of reviewing and commenting on the Plan. The PO's analysis and conclusions reflect careful, well-reasoned and forward-thinking judgment that will serve to foster the success of the demand-side portfolio now and in the future.

In this brief, NRDC identifies and advocates for: (A) the central elements of the PO that should remain unaltered in the final Order, as they are essential for supporting demand-side portfolio and program performance during the implementation phase of the Plan; and (B) the several critical modifications to strengthen the final Order necessary to assure effective development and implementation of the Plan for which we provide specific exception language.

Essential Elements of the Proposed Order that Should Remain in the Final Order

The following elements of the PO are essential for the success of the portfolio and reaching program goals, and should remain in the final Order:

- **Further Reduce Consumption:** Recognition that much more needs to be done to reduce consumption in IL;
- **Portfolio-level TRC:** Adoption of portfolio, rather than measure-level, Total Resource Cost (TRC) analysis;
- **Stakeholder Group:** Adoption of the Stakeholder Group;
- **“Banking” savings;**
- **“Deeming”:** “Deeming” measure savings for lighting but not for Net-To-Gross (NTG) ratios;
- **Staff Workshops:** Recognizing need for and requiring Staff workshops;
- **Evaluation, Measurement & Verification (EM&V) issues;**
 - **Independent Evaluator Not Dispositive of Performance:** The PO appropriately concludes that Ameren’s independent evaluator is not the only entity competent to provide evidence about whether Ameren has met its energy savings targets;
 - **ICC Hires and Fires EM&V Contractor:** Also, the PO appropriately determines that for the EM&V contractor to satisfy the statutory requirement of “independence”, the ICC must have ability to hire and fire the utility’s independent EM&V contractor.

Requested Changes to the Proposed Order

NRDC requests that the final Order be modified to better meet the goals and requirements of the energy efficiency and demand side portfolio law, as follows:

- **Stakeholder Group:**
 - **Expand SG Objectives:** The PO should expand Stakeholder Group objectives, consistent with Ameren’s testimony;
 - **Require SG Annual Report:** The PO should require that Ameren and the Stakeholder Group work together to provide the ICC with an Annual Report;
- **“Spillover”:** the independent EM&V contractor, under ICC Staff guidance, rather than Ameren, should determine whether it is appropriate to include spillover in NTG ratios;
- **Statewide Consistency:** the final Order should add a required showing: even if ICC does not want to *require* statewide consistency, it should make the stated policy preference for statewide consistency meaningful by requiring Ameren to demonstrate how the portfolio is statewide consistent, and explaining how differences in the portfolio result from the differences in the respective service territories.

II. BRIEF ON EXCEPTIONS

a. The Final Order Should Retain Key Important Elements of the Proposed Order

The PO is important not only because it approves the Plan, but also because it begins to establish a regulatory oversight framework for demand-side resources that is essential for maximizing cost-effective savings and for producing measurable and reliable savings. The final Order should retain the elements listed below contained in the Proposed Order:

i. Recognition that Consumption Can be Further Reduced in IL

NRDC agrees strongly with the PO as it addresses the issue of increasing the statutorily-imposed energy efficiency and demand response goal in IL, and includes the forward-thinking statement that “much more needs to be done in Illinois in order to reduce energy consumption.” (PO, mimeo, p. 20.) Although the current goals will provide measurable demand-reduction, they do not reflect the full potential of demand-side resources. NRDC recommends that staff consider seeking comments on the possible magnitude of cost-effective energy efficiency and demand-response in the staff-led workshops. In addition, Ameren or the technical consultant to the Stakeholder Group could commission a technical potential study to quantify the full potential for the demand-side, which would indicate how energy savings targets could be increased in the future.

ii. Adoption of Portfolio-Level TRC Analysis

NRDC strongly supports the PO finding, based on the Department of Commerce and Economic Opportunities' (DCEO) testimony, that the TRC should be calculated at the portfolio, rather than measure, level. (PO, mimeo, p. 20.) Portfolio-level TRC analysis is consistent with the statutory directive that the utilities "demonstrate that its overall portfolio of energy efficiency and demand-response measures . . . [not including low-income programs] . . . are cost-effective using the total resource cost test" (Section 12-102(f)(5) of the Public Utilities Act.) Furthermore, it is sound policy because portfolio-level TRC calculation will result in increased potential energy savings, ratepayer cost savings, and environmental benefits compared to measure-level TRC analysis.

iii. Permitting *de minimus* "Banking" of Savings

The Proposed Order permits some banking of savings and *de minimus* cost overruns associated with Ameren's achieving increased savings compared to targets. (Proposed Order, mimeo, p. 28.) NRDC supports banking, because banking will encourage Ameren to produce the greatest amount of savings within the statutory spending cap. NRDC recommends that Staff address in its workshops whether "unlimited" banking, as long as spending is within statutory spending caps, would better maximize all cost-effective energy efficiency that a 10% limit on banking.

iv. “Deeming” Measure Savings for Lighting but not NTG Ratios

The Proposed Order permits “deeming” of lighting measures until better values are produced, but does not adopt NTG ratios from California.

(Proposed Order, mimeo, pp. 29-32.) This resolution of the “deeming” issue strikes a reasonable balance between providing some certainty to Ameren about forecast values, while directing Midwest specific values for NTG ratios that are likely to be superior to those produced in California, a jurisdiction with very different characteristics than IL.

v. Requiring Further Staff-led Workshops

The Proposed Order recognizes that Plan approval is only the first step in ensuring transparency and accountability to ratepayers to ensure funds are prudently and reasonably spent, and to produce measurable and reliable savings from energy efficiency and demand response that can offset conventional supply-side resources. Other jurisdictions that have produced successful energy efficiency and demand-response programs have robust regulatory oversight of the demand-side portfolio. The PO requirement for staff-led workshops will allow the important regulatory infrastructure to develop in IL on a more reasonable timeframe that was permitted by statute for this docket. (Proposed Order, mimeo, p. 33.) NRDC understands the PO requirement for staff-led workshops to be a significant commitment to building regulatory capacity and policy in

Illinois, and to collaborative with the Stakeholder process addressed in the PO and record of this proceeding; not in competition with the Stakeholder process, which is also critically important for reaching the requirements and goals of the law.

vi. EM&V: Acknowledging that the Independent EM&V Contractor is Not the Only Entity Competent to Provide Evidence About Ameren's Performance

The Proposed Order concludes that the Commission's review of Ameren's Plan to determine compliance with statutory targets is separate from the independent evaluation required by Section 103(f)(7). (Proposed Order, mimeo, p. 27.) This conclusion is a reasonable interpretation of the statute. In addition, given that EM&V funds are limited to 3%, other evidence might be needed and useful to assess compliance with targets and other statutory goals.

vii. EM&V: The ICC Must Be Able to Hire and Fire Ameren's Independent EM&V Contractor

The Proposed Order correctly interprets statutory language directing an "independent" evaluation of the cost-effectiveness of the portfolio of measures to mean that the *Commission*, rather than Ameren or the Stakeholder Group, should hire and fire the evaluator. (Proposed Order, mimeo, p. 32) The independence of the evaluation would be seriously compromised if Ameren retained the authority to hire or fire the evaluator. Designating Ameren to be in charge of its own performance evaluation is like the fox guarding the hen house. Furthermore, this Conclusion is

consistent with practice in California, where the California Public Utilities Commission is in charge of EM&V contractors (including hiring, firing, contracting with the evaluators and contract administration) using funds collected by the utilities.

b. The Final Order Should Contain Some Changes to Further Strengthen Oversight and Performance of the Emerging Demand-Side Portfolio

i. The Stakeholder Group Objectives Should Be Clarified and Expanded, Consistent with Ameren's Testimony

The PO concludes that Ameren should "establish a stakeholder process to review Ameren's progress towards achieving the required energy efficiency and demand response goals." (PO, mimeo, p. 24.) Ameren and all other stakeholders, with the possible exception of ICC Staff, view the Stakeholder Group (SG) as essential for optimizing portfolio performance and providing accountability and transparency.

NRDC notes, first, that the role and value of the SG is separate and distinct from the purpose of Staff-led workshops. The essential purpose of the SG is to advise Ameren on optimizing its portfolio of programs. Examples of issues that stakeholders might elect to address in the SG include: suggestions for additional programs that Ameren might consider adding in the future; suggested modifications to existing programs to improve program cost-effectiveness or program penetration; and ways to improve marketing and outreach to customers to get more customers to select energy efficient technologies. In contrast, the ICC Staff-led workshops are needed to solicit stakeholder input on the ongoing

regulatory oversight framework that is essential to ensure that Ameren is meeting its goals and the savings are measurable and reliable. Topics that could be addressed in ICC Staff-led workshops include: appropriate measure savings values; appropriate NTG ratios for IL; financial and accounting rules for EE Funds, and a statewide public cost-effectiveness calculator. (NRDC Brief, p. 13.) If Ameren begins the SG before Staff-led workshops commence, Ameren should solicit input from the SG on what areas should be deferred to the Staff-led workshops to minimize unnecessarily duplication and administrative burden on Ameren, ICC Staff, and SG members.

Second, NRDC recommends that the PO language addressing the role of the SG be expanded to provide needed guidance and direction to the SG, will help clarify its role, and make the group more effective and efficient. NRDC's proposed additions on the role of the SG are set forth below in the "exceptions" section.

ii. Ameren and the Stakeholder Group Should Work Together To Provide An Annual Report to the ICC

The PO concludes that "The advisory committees need not report to the Commission." (PO, mimeo, p. 25.) To provide thoughtful, meaningful and helpful review and comment to Ameren, stakeholder group members will likely put significant time into the SG process. Furthermore, SG review and input should help the ICC assess whether Ameren's expenditures were prudent and made good use of ratepayer funds and whether Ameren met statutory goals. It will be useful for Ameren and SG

members to reflect and report to the Commission on whether the SG is accomplishing the stated objectives, and to identify ways to improve the process. The annual report does not need to be a big, expensive undertaking. The SG facilitator could prepare an annual report by soliciting comments from participants on how well the process has worked, and how it could be improved to make better use of time. In addition, the SG facilitator could append the "Comment Tracking and Response System" which lists SG member's recommendations, and indicates whether Ameren modified programs or the portfolio in response to the recommendations.

iii. The Independent EM&V Contractor, Rather than Ameren, Should Determine Whether to Include "Spillover" in NTG Ratios

The Proposed Order states that: "we decline to order Ameren to exclude "spillover" from any Net to Gross ratio calculation." (PO, mimeo, p. 30.) However, the PO notes that the ICC will "hire and fire" the independent evaluator." Given that the evaluator is supposed to be independent, and make an independent determination of how Ameren's portfolio of programs should be assessed to maximize the benefit from the limited EM&V budget, it is properly the independent evaluator, under the guidance of ICC Staff, who should assess whether spillover should be included in the NTG ratio.

iv. Ameren Should Be Required to Demonstrate How Its Portfolio is Statewide Consistent, and How Differences Result from Differences in Ameren and Ameren's Service Territories

The Proposed Order states a policy preference for statewide consistency “when such coordination reduces costs or administrative burdens, or, when such coordination would improve program performance.” (PO, mimeo, p. 34.) However, the PO declines to *require* coordination.

Statewide consistency provides real and obvious benefits to customers as well as stakeholders. Statewide consistency that reduces costs or improves program performance is consistent with the long-established regulatory principles of least-cost planning and prudent use of ratepayer funds. Both the ICC, in its regulatory capacity, and Ameren are stewards of ratepayer funds and have a duty to assure ratepayer funds are not squandered and instead are used efficiently and effectively. The rationale that Ameren and Ameren provide for not supporting statewide consistency is that their service territories are different. (*Id.*) However, service territory differences do not necessarily mean programs need to be different to be effective. Different programs, with different incentive levels, program participation requirements and applications, particularly for the many customers that operate in both service territories such as big box retailers, will absolutely and unnecessarily increase costs and increase customer confusion, resulting in a needless squandering of ratepayer funds and less effective programs.

If the Proposed Order declines to require consistency and coordination, even when doing so will reduce costs and/or improve program effectiveness, it should at a minimum require the utilities to make a showing of what areas of their portfolios are consistent, and which are not. For areas that are inconsistent, the utilities should be required to describe how differences in the programs or portfolio result from differences in the respective service territories.

III. EXCEPTIONS

a. Stakeholder Group (PO, mimeo, p. 24.)

The Commission agrees with Ameren that it should establish a stakeholder group process to review Ameren's progress towards achieving the required energy efficiency and demand response goals *and to continue strengthening the portfolio. The stakeholder group's responsibilities include: reviewing final program designs; establishing agreed-upon performance metrics for measuring portfolio and program performance; reviewing Plan progress against metrics and against statutory goals; reviewing program additions or discontinuations, reviewing new proposed programs for the next program cycle and reviewing program budget shifts between programs where the change is more than 20%.*

b. Stakeholder Group Annual Report (PO, mimeo, p. 25.)

The advisory committee ~~need not~~ *shall* report to the Commission. *The report may be prepared by the SG facilitator, and may include observations from participants on how well the process worked, how it might be improved, and a list of recommendations from SG members on program and portfolio performance, with a response from Ameren to the recommendations.*

c. Including "Spillover" in the NTG ratios (PO, mimeo, p. 30.)

~~We decline to order Ameren to exclude "spillover" from any Net to Gross ratio calculation. The independent EM&V contractor, in consultation with ICC Staff, shall determine whether "spillover" shall be included in the Net to Gross ratios.~~

d. Statewide Consistency (Proposed Order, mimeo, p. 30.)

This Commission agrees that coordination between Ameren and Ameren, as well as with DCEO, when such coordination reduces costs or administrative burdens, or, when such coordination would improve program performance, is desirable. We encourage the utilities to coordinate as much as possible. However, we decline to *require* the utilities to do so. *When the utilities present final program designs to the Stakeholder Group for review and comment before the June 1, 2008 Plan start date, they shall identify all programs and program features that are statewide consistent. For programs and program features that are not consistent,*

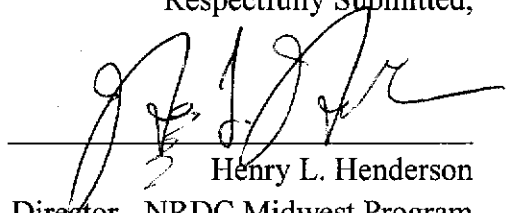
the utilities shall identify how the differences result from the unique circumstances of its service territory.

IV. CONCLUSION AND REQUEST

Illinois is on the brink of a New Energy Future. This future will involve meeting new load growth with cost-effective demand-side resources, and meeting residual load growth with cleaner energy sources. Both customers and the environment will benefit. NRDC looks forward to ongoing constructive and productive engagement with Ameren, the ICC, and other stakeholders to make the New Energy Future a reality.

NRDC requests that the Commission adopt the Proposed Order, with the exceptions noted herein.

Respectfully Submitted,



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February 1, 2008

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d/b/a AmerenCILCO,
CENTRAL ILLINOIS PUBLIC SERVICE
COMPANY d/b/a AmerenCIPS and
ILLINOIS POWER COMPANY d/b/a
AmerenIP**

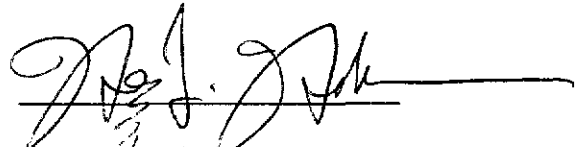
**Approval of Energy Efficiency and
Demand Response Plan.**

Docket No. 07 – 0539

NOTICE OF FILING

To: Service List

Please take notice that on February 1, 2008 I caused to be sent to Elizabeth A. Rolando, Chief Clerk, Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, 62701, by U.S. Postal Service, the Natural Resource Defense Council's Brief on Exceptions in the captioned proceeding.


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February 1, 2008

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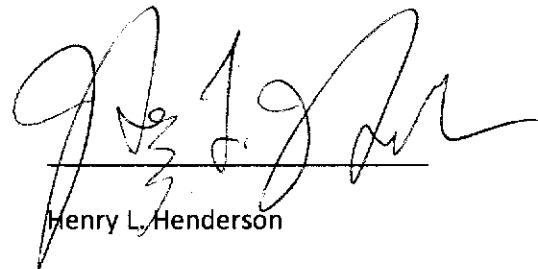
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Docket No. 07 – 0539

CERTIFICATE OF SERVICE

I, Henry L. Henderson, hereby certify that a copy of the Natural Resource Defense Council's Brief on Exceptions in the captioned docket, was electronically served upon the parties listed in the Service List for this docket, in accordance with the Rules of Practice of the Illinois Commerce Commission.

Dated: February 1, 2008



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